

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re patent application:

Appl. No.	:	10/582,741	) Examiner: Yonas A Bayou
Applicant	:	James A. Euchner, et al.	
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**PRE-APPEAL BRIEF CONFERENCE REQUEST**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

Applicant requests this pre-appeal review to consider the Examiner's rejection of claims 1-4, 6 and 7 in the Final Office Action dated February 18, 2010. A Notice of Appeal is filed herewith. Current claims 1-4, 6 and 7 are attached in Appendix A.

**Claim Rejections 35 USC § 102**

Claims 1-4, 6-7 were rejected under 35 USC § 102(b) as being anticipated by Pintsov, Patent Number: 6,125,357 ("Pintsov").

Pintsov shows an example of how it was known to include information from the address block in the postage indicia, in order to allow verification of the postage mark. This general concept was also acknowledged in the background section of the present application. (See e.g. paras. 10, 11.) There are a number of different ways described in which address information has been incorporated into the postage indicia to enhance security. With respect to the asserted Pintsov reference, it is taught that certain

characters are taken from select positions in the address block, which are then included in the indicia. See Fig. 1: **26, 28, 30**; col. 6, lines 34-58. However, The Examiner has taken an unreasonable position by equating the incorporation of address information in the indicia to taking an image of the face of the mail piece.

The difference of the present application is that particular characters from the address block are not being used. Rather, a “digital image” and an “image digest” of the address block are being incorporated into the indicia and used for verification. “A digital binary image of this address from a computational viewpoint represents a collection of black and white picture elements (pixels).” (para. 64) Thus, the Examiner’s interpretation of “digital image” is contrary to the specification’s definition. The acknowledged prior art, and the Pintsov reference do not teach or suggest using an image of the address block. Use of the image provides flexibility, since it is not necessary to interpret, or understand, the characters in the address block. This new invention even allows that the address block may include non-standard formatting, or foreign characters. These novel and non-obvious features are further described in the specification at paragraphs 26-29. (See also para. 11, “One of the main improvements of the present patent application lies in the use of a new hybrid digital signature scheme that avoids hashing of at least one part of the data that has to be digitally signed.”)

Because Pintsov fails to disclose or suggest the missing features of using a “digital image” of the address block to generate an “address block image digest”, to compare with an “image digest” stored in the digital postage mark, it is submitted that the rejections of independent claims 1, 4, and 6, along with their dependent claims, should be withdrawn.

## **Conclusion**

It is submitted that the application is in condition for allowance. Please direct any questions to the attorney below.

Respectfully submitted,

/Michael J. Cummings/  
Michael J. Cummings  
Reg. No. 46,650  
Attorney of Record  
Telephone (203) 924-3934

PITNEY BOWES INC.  
Intellectual Property and  
Technology Law Department  
35 Waterview Drive  
Shelton, CT 06484-8000

## **APPENDIX A**

1. A method for verifying a digital postage mark, the method comprising the steps of:
  - scanning a mail item with an optical scanning device to obtain a digital image of the mail item, the mail item including a digital postage mark and a destination address block;
  - parsing, with a processor, the digital image to obtain a digital postage mark area and a destination address block area;
  - generating, with the processor, a first address block image digest using the digital image of the destination address block area;
  - retrieving a second address block image digest from the digital postage mark area;
  - comparing, with the processor, the first address block image digest to the second address block image digest; and
  - accepting the mail item when the comparison of the first address block image digest to the second address block image digest is within a predetermined threshold.
2. The method of claim 1 comprising the further step of:
  - rejecting the mail item when the comparison of the first address block image digest to the second address block image digest is beyond a predetermined threshold.
3. The method of claim 1 wherein the second address block image digest is in a cryptographic validation code in the digital postage mark area.

4. A method for generating a mail item, the method comprising the steps of:
  - generating an address block image digest using a first portion of a destination address block of the mail item;
  - using the address block image digest as a recoverable portion of a cryptographic validation code;
  - formatting the recoverable portion of a cryptographic validation code with other postal data for digital postage mark information computation; and
  - printing the digital postage mark information on one of the mail item, label or tag;
5. (Cancelled)
6. A method for verifying a digital postage mark, the method comprising the steps of:
  - scanning the mailpiece with an optical scanner device to obtain a digital image of the mailpiece, the mailpiece including the digital postage mark and a destination address block;
  - retrieving, with a processor, a representative portion of a destination address block image in its original form from the digital signature;
  - comparing, with the processor, the representative portion of the destination address block image with digital image data obtained from the scanned destination address block;
  - accepting the mailpiece when the comparison of the representative portion of the destination address block image with the digital image data is within a predetermined threshold.
7. The method of claim 6 comprising the further step of:

rejecting the mailpiece when the comparison of the representative portion of the destination address block image with the digital image data is beyond a predetermined threshold.